

# **Consultation on City of Edinburgh Council's draft Second Proposed Local Development Plan, June 2014**

## **Proposal from Blackford Hill Ltd on the development of Midmar Paddock**

Amend the green belt boundary to exclude land at Midmar from the Green Belt and allocate it for housing development (8-10 dwellings). The site would comply with SDP Policy 7 and would not undermine the green belt objectives. All infrastructure would be funded by the developer. The site is not identified as Grade 1 agricultural land, is considered to be effective and deliverable and will meet the shortfall in the housing land supply.

## **Proposal from Save Midmar campaign**

Support the designation of Midmar Paddock as green belt, open space, Local Nature Conservation Site and Special Landscape Area.

## **The Scottish Government response**

The suggested green belt change to land at Midmar and suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 17. No modification proposed.

Our conclusions on these sites do not support their deletion from the green belt and consequently Policy Env 10 would continue to apply.

The designation of Midmar Paddock as green belt, open space, Local Nature Conservation Site and Special Landscape Area is supported. The site is important in terms of contribution to landscape and setting of the conservation area. It also contributes to the ecology, provides an amenity space and establishes a clear green belt boundary.

Development of the site would impact adversely on the landscape setting of the city due to the loss of landscape features and views of the city-wide importance. The existing road is a clear green belt boundary allowing key city views. The development would result in a poorly defined boundary. Development of the site would introduce urban residential development into an area of open space on the western fringe of Blackford Hill thereby diluting the clear definition between the single sided urban street and the open landscape which define the boundary of the adjoining Morningside Conservation Area. The development would restrict views and informal access routes across the open space, thereby harming countryside recreation. The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modification proposed.

The Scottish Government Reporter stated in a letter to the City of Edinburgh Council, in June 2016:

**Midmar Paddock Site selection and accessibility**

9. This comprises two adjoining paddocks of green belt land, separated only by a public footpath, within a larger area of open space known as The Hermitage of Braid that also encompasses wooded valleys along the Braid Burn. The site is located immediately to the north of Braid Burn and Blackford Hill and to the west it abuts residential areas within Morningside Conservation Area. The site is within an area identified as protected open space for grazing and this is crossed by a number of linked un-surfaced footpaths, which were well used by recreational walkers during my site visit. Whilst the site is solely accessed on foot, it is reasonably accessible by public transport. It adjoins the junction of Hermitage Drive and Midmar Drive where there is a small public car park for visitors wishing to access the walks through the site linking to others further afield in the PROPOSED EDINBURGH LOCAL DEVELOPMENT PLAN 605 countryside areas immediately to the south and east.

10. In the above context I am concerned, firstly, that the proposed allocation for housing development, no matter how well designed and landscaped, would impact adversely to an unacceptable degree on the role of this land as one of the key points of access leading into the Hermitage of Braid and Blackford Hill Local Nature Reserve (LNR). This includes the historic Hermitage House located within a secluded valley to the south of the site in question. This area, as well as having significant heritage and landscape qualities, appears to be widely used and enjoyed by visitors for its unspoilt rural character on the fringe of the built-up area of this part of the city. This is reflected in the number of representations lodged and the concerns that have been raised by those objecting to the proposed allocation. Based on the considerations summarised above and others outlined below, I share many of those concerns. Green Belt and landscape considerations

11. The proposal as well as seeking the site's removal from the green belt proposes a housing allocation here for 8-10 houses with the remainder of the land being retained as green space. In support of this position, it is contended that this would not be in conflict with development plan policies, would be in keeping with the character of the adjacent residential area, as well as not undermining green belt objectives. I do not find those arguments persuasive and instead consider that they are outweighed by the detailed site specific and policy-based case for maintaining the 'status quo' – as being advocated by the council and by those registering concerns about the proposal. In summary, for the reasons outlined below I find most compelling the evidence that justifies retaining the site in the green belt and protecting it against the likely adverse effects on the local ecology and recreational amenity if the site was reallocated, even in part, for housing development.

12. More specifically I am concerned that the proposal would allow urban expansion, albeit in a limited form, into an area of accessible and well-used recreational open space that is also performing a valuable role in the green belt. As such in my view this land should be safeguarded from built developments. I am also concerned that such an allocation would lead to a less clear and less defensible definition of the remaining greenbelt land and in my opinion, it would erode the overall integrity of the Hermitage of Braid area and its heritage and recreational values, which appear to be well respected and appreciated by local users and visitors. Furthermore, given the fact that it is overlooked from higher vantage points, at the local and strategic levels I conclude that the proposed allocation would be wholly inappropriate as

the resulting development would have a significant adverse impact on the visual amenity and landscape setting of this part of the city, which merits being protected.

13. Based on the available evidence, the considerations outlined above and my own site visits, I conclude that the site today meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the Scottish Planning Policy (SPP). As development of part of the site for housing would have a significant adverse effect on local and wider views of this and adjoining parts of the green belt, I consider that this would be inappropriate and unjustified. I conclude that the proposal would not be consistent with the terms of policy 12 of SESplan or paragraph 34 of the proposed plan - both of which highlight that one of the objectives of green belts is to protect and provide opportunities for access to open space and the countryside. Furthermore, I conclude that the proposal would not satisfactorily address criteria (a) and (b) of policy 7 of SESplan. PROPOSED EDINBURGH LOCAL DEVELOPMENT PLAN 606 Based on all of these considerations, I conclude that the proposed allocation would be wholly inappropriate and instead the site should be retained unaltered for its important contribution to the green belt as well as for its recreational value. The site and its adjoining visitor car park were both being well used by walkers during my site visit, which was consistent with the statements made in representations lodged objecting to the loss of the recreational opportunities here if the site was reallocated.

14. Given the above conclusions, which in combination rule out the principle of this allocation, I have not given close consideration to other matters such as educational provision, and the adequacy of other infrastructure capacities of local community facilities and services to serve any new residential development on the site in question. I do not consider the benefits of adding to the housing land supply would **outweigh the adverse impacts identified above.**